

Plaintiff's Name

CDCR No. WB1153Address CCWF, SDS-23P.O. BOX 1508

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

CARROLL, T., BROWN, L., TOOKS, T., PATTON, N.

1:23-cv-00005-SAB(PC)

(Name of Plaintiff) WILLIAMS, D

(Case Number)

VS.

CIVIL RIGHTS COMPLAINT UNDER:

☐ 42 U.S.C. 1983 (State Prisoner)CDCR, ET. ALJOHN/JANE DOE(S) 1-100SECRETARY ALLISONWARDEN PARRALESCDCR CHIEF MEDICAL OFFICERCCWF CHIEF MEDICAL OFFICER

(Names of all Defendants)

I. Previous Lawsuits (list all other previous or pending lawsuits on additional page):

A. Have you brought any other lawsuits while a prisoner? Yes ☒ No ☐B. If your answer to A is yes, how many? MULTIPLE

Describe previous or pending lawsuits in the space below. (If more than one, attach additional page to continue outlining all lawsuits in same format.)

1. Parties to this previous lawsuit:

Plaintiff CARROLL, TDefendants C/O TOOLE, ET. AL

2. Court (if Federal Court, give name of District; if State Court, give name of County)

U.S. DISTRICT COURT3. Docket Number 3:20-cv-00079-BAS-4. Assigned Judge RBMRBM

SETTLED6. Filing Date (approx.) 20197. Disposition Date (approx.) 2022

II. Exhaustion of Administrative Remedies

NOTICE: Pursuant to the Prison Litigation Reform Act of 1995, A[n]o action shall be brought with respect to prison conditions under [42 U.S.C. * 1983], or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted. § 42 U.S.C. * 1997e(a). Prior to filing suit, inmates are required to exhaust the available administrative remedy process, Jones v. Bock, 549 U.S. 199, 211, 127 S.Ct. 910, 918-19 (2007); McKinney v. Carey, 311 F.3d 1198, 1999 (9th Cir. 2002), and neither futility nor the unavailability of money damages will excuse the failure to exhaust, Porter v. Nussle, 534 U.S. 516, 524, 122 S.Ct. 933, 938 (2002). If the court determines that an inmate failed to exhaust prior to filing suit, the unexhausted claims will be dismissed, without prejudice. Jones, 549 U.S. at 223-24, 127 S.Ct. at 925-26.

A. Is there an inmate appeal or administrative remedy process available at your institution?

Yes ☒ No ☐B. Have you filed an appeal or grievance concerning ALL of the facts contained in this complaint?Yes ☒ No ☐

C. Is the process completed?

Yes ☒

If your answer is yes, briefly explain what happened at each level.

WE EACH FILED APPROPRIATE CDCR FORMS BUT CDCR IS
TRYING TO USE "GREEN WALL" TACTICS TO COVER
THESE THINGS UP

No ☐

If your answer is no, explain why not.

III. Defendants
List each defendant's full name, official position, and place of employment and address in the spaces below. If you need additional space please provide the same information for any additional defendants on separate sheet of paper.

- A. Name KATHLEEN MASON is employed as CDOP SECRETARY
Current Address/Place of Employment CDOP HEADQUARTERS
- B. Name PARNALLS is employed as CCWF WARDEN
Current Address/Place of Employment CCWF
- C. Name JOHN/JANE DOE is employed as CDOP CMO
Current Address/Place of Employment CDOP HEADQUARTERS
- D. Name JOHN/JANE DOE is employed as CCWF CMO
Current Address/Place of Employment CCWF
- E. Name JOHN/JANE DOE 1-100 is employed as CDOP STAFF / CDOP CONTRACTED
Current Address/Place of Employment UNKNOWN

IV. Causes of Action (You may attach additional pages alleging other causes of action and the facts supporting them if necessary. Must be in same format outlined below.)

Claim 1: The following civil right has been violated (e.g. right to medical care, access to courts, due process, free speech, freedom of religion, freedom from cruel and unusual punishment, etc.):

CRUEL AND UNUSUAL PUNISHMENT, FAILURE TO PROTECT, RIGHT TO MEDICAL CARE.

Supporting Facts (Include all facts you consider important to Claim 1. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

CARROLL, TRE MAYNE; BROWN, LATASHA; TOOKS, TIFFANY; PATTON, NORMA; WILLIAMS, JERMA (WILLFULLY NEGLECTED CCWF VICTIMS) WERE ALL INJURED AS A RESULTED OF CDOP/CCWF WILLFUL/WANTON NEGLECT TO FIX THE HAZARDOUS ROADS/PATH OF TRAVEL THAT HAVE BEEN OUT-OF-COMPLIANCE WITH ADA GUIDELINES FOR SAFE

PLEASE SEE ATTACHED PAGES 1-9 THAT INCLUDE PETITION FOR PRELIMINARY INJUNCTIVE RELIEF, TEMPORARY RESTRAINING ORDER, AND APPOINTMENT OF COUNSEL (WE WILL BE SEEKING REPRESENTATION BY RBEG-- THE ARMSTRONG CLASS ATTORNEYS, JENNIFER ORTHWEIN OR APPOINTMENT FROM THIS HONORABLE COURT). ALSO ATTACHED IS (5) DECLARATIONS AUTHORED BY CARROLL PER CCP 3163 ON BEHALF OF THE (4) OTHERS IN THEIR OWN WORDS.

PLEASE SEE ATTACHED PAGES 1-9 THAT INCLUDE PETITION FOR PRELIMINARY INJUNCTIVE RELIEF, TEMPORARY RESTRAINING ORDER, AND APPOINTMENT OF COUNSEL (WE WILL BE SEEKING REPRESENTATION BY RBEG-- THE ARMSTRONG CLASS ATTORNEYS, JENNIFER ORTHWEIN OR APPOINTMENT FROM THIS HONORABLE COURT). ALSO ATTACHED IS (5) DECLARATIONS AUTHORED BY CARROLL PER CCP 3163 ON BEHALF OF THE (4) OTHERS IN THEIR OWN WORDS.

YEARS OF COMPLAINTS AND YEARS OF MULTIPLE CCWF INMATES BEING INJURED AS A RESULT OF CDCR/CCWF RECKLESSLY ENDANGERING THE LIVES OF THE INMATE/ADA POPULATION. THE MOBILITY IMPAIRED AS WELL AS THE INMATES STAFF GIVE DIRECT ORDERS TO PUSH/ASSIST. NEITHER CDCR NOR CCWF CAN CLAIM IGNORANCE, AS THEY ALL KNEW OR SHOULDVE KNOWN THAT MYSELF AND THE OTHER (4) PLAINTIFFS WOULD GET INJURED IF THEY (CDCR/CCWF) DIDNT FIX ROADS. MORE INMATES WILL GET INJURED IF THIS ISNT IMMEDIATELY FIXED. ALL AVSS AND DOCUMENTS BE PRESERVED.

Claim 2: The following civil right has been violated (e.g. right to medical care, access to courts, due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.):

OUR 4TH, 5TH, 8TH AND 14TH AMENDMENT RIGHTS HAVE BEEN VIOLATED AS WELL AS OUR CIVIL RIGHTS, AS WE'RE ALL BLACK, MOST LGBTQ, OTHERS ADA, ALL EQUALLY DISCRIMINATED AGAINST

Supporting Facts (Include all facts you consider important to Claim 2. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

PLEASE SEE ATTACHED PAGES 1-9 THAT INCLUDE PETITION FOR PRELIMINARY INJUNCTIVE RELIEF, TEMPORARY RESTRAINING ORDER, AND APPOINTMENT OF COUNSEL (WE WILL BE SEEKING REPRESENTATION BY RBEG-- THE ARMSTRONG CLASS ATTORNEYS, JENNIFER ORTHWEIN OR APPOINTMENT FROM THIS HONORABLE COURT). ALSO ATTACHED IS (5) DECLARATIONS AUTHORED BY CARROLL PER CCP 3163 ON BEHALF OF THE (4) OTHERS IN THEIR OWN WORDS.

CARROLL, T. WB1153
CCWF, 505-23
P.O. BOX 1508
CHOWCHILLA, CA 93610

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

~~PLAINTIFFS~~

WILLFULLY NEGLECTED
CCWF VICTIMS
CARROLL, TREMAYNE
BROWN, LATASHA
TOOKS, TIFFANY
PATTON,
WILLIAMS,
PLAINTIFFS

CASE NO.

PETITION FOR PRELIMINARY
INJUNCTIVE RELIEF, TEMPO-
RARY RESTRAINING ORDER,
APPOINTMENT OF COUNSEL,
CIVIL DAMAGES PER VS
1983, 4TH, 8TH, 14TH
AMENDMENT VIOLATIONS.

~~DEFENDANTS~~

CDCR, ET., AL.
JOHN/JANE DOE(S)
1-100,
DEFENDANTS

PLAINTIFFS ("WILLFULLY NEGLECTED CCWF VICTIMS")
CARROLL, T., BROWN, L., TOOKS, T., PATTON, ,
WILLIAMS, CONTEND THAT THEY'RE INDIGENT/
INMATE/PATIENTS IN CDCR MHDS AT CCCMS
P.C. 1258


LEVEL OF CARE INDIVIDUALLY / COLLECTIVELY
SEEKING DAMAGES AND RELIEF UNDER US 1983,
WHILE INDIVIDUALLY / COLLECTIVELY SEEKING
APPOINTMENT OF COUNSEL, PRELIMINARY IN-
JUNCTIVE RELIEF AND TEMPORARY RE-
STRAINING ORDER AGAINST CQ CR, ET. AL
(JOHN/JANE DOES 1-100).

PLAINTIFFS CONTEND THAT THERE ARE
BLATANT CIVIL RIGHTS VIOLATIONS ARE
THEY'RE ALL AFRICAN-AMERICAN, CARROLL
AND TOOKS ARE TRANSWOMEN WHILE
BROWN IS LGBTQ. CARROLL, PATTON
AND WILLIAMS ARE ALL ADA / MOBILITY
IMPAIRED. CARROLL AND WILLIAMS ARE
HEARING IMPAIRED.

ALL ARE FALSELY IMPRISONED AS THEIR
SENTENCES WERE / ARE RACIALLY MOTIVATED
AND IN VIOLATION OF RACIAL JUSTICE
ACT. CARROLL AND BROWN HAVE SERVED
OVER (20) YEARS EACH FOR JUVENILE CON-
VICTIONS. TOOKS (30), WILLIAMS (40) YEARS
RESPECTIVELY.

APPOINTMENT OF COUNSEL NECESSARY TO
BALANCE SCALES OF JUSTICE.

THE ABOVE IS TRUE TO MY KNOWLEDGE.

(SIGN)  (IN PRO-SE) (DATE) 12/26/22

P-C1258

DECLARATION...

I, CARROLL TREMAYNE (#WB1153), DECLARE UNDER MY OWN FREE WILL THAT I AM A PLAINTIFF / PARTY / WITNESS / AUTHOR VERSUS CDCR, ET. AL IN THIS CIVIL ACTION BEING BROUGHT BY MYSELF, 'P BROWN (X-08560), 'P TOOKS (WB1123), 'P WILLIAMS (), 'P PATTON AND OTHERS REGARDING CRUEL / UNUSUAL PUNISHMENT, DELIBERATE INDIFFERENCE, RECKLESS ENDANGERMENT, FAILURE TO PROTECT, FAILURE TO SUPERVISE, RETALIATION, DISCRIMINATION, DENIAL OF MEDICAL TREATMENT, WILLFUL / WANTON NEGLIGENCE, RACIAL AND GENDER BIAS, ETC.

ON 12/24/22, AT APPROXIMATELY 0800 HOURS I SUFFERED MULTIPLE INJURIES AFTER FALLING OUT OF MY WHEELCHAIR DUE TO A HAZARDOUS CRACK IN THE PAVEMENT IN FRONT OF CCWF / BODS CLINIC. CCWF STAFF HAD 'P BROWN, L PUSHING ME. SHE SUFFERED MULTIPLE INJURIES WHILE TRYING TO PREVENT ME FROM FALLING AND SHE WAS DENIED MEDICAL TREATMENT. I INJURED MY HEAD, NECK, SHOULDER, BACK, ARMS, WRISTS, FINGERS, KNEE AND ANKLE AND ONLY RECEIVED AN ICE PACK AND MOTRIN. I ARRIVED AT CCWF 08/26/21 AND IMMEDIATELY NOTICED THAT CCWF WAS OUT-OF-COMPLIANCE

P.C. 125B

WITH FEDERAL ADA GUIDELINES THAT AFFORD MOBILITY IMPAIRED INMATE/PATIENTS THE RIGHT TO PAVED/SAFE PATH OF TRAVEL. AS A PERMANENT WHEELCHAIR ADA/INMATE/PATIENT, THIS INSPIRED FEAR, SO I'VE FILED OVER (20) COMPLAINTS ABOUT THIS SPECIFIC ISSUE, SOME OF WHICH ARE CAPTURED ON VIDEO WITH AN DILL DURING MY BI-WEEKLY COURT-ORDERED MEETINGS WITH HER. FOR HER PART, AN DILL HAS ADDRESSED THESE ISSUES WITH NO RESULTS.

CJCR/CCWF AND ITS SECRETARY AND HIRING AUTHORITY, RESPECTIVELY, KNEW OR SHOULD'VE KNOWN MYSELF, 'IP BROWN, 'IP TOOKS, 'IP PATTON AND 'IP WILLIAMS WOULD FACE AND/OR SUFFER SERIOUS PHYSICAL INJURY AS A RESULT OF THEIR UNWILLINGNESS TO FIX THE GROUNDS BASED ON ALL OF THE DOCUMENTED COMPLAINTS BY MYSELF AND OTHERS AND BASED ON THE DOCUMENTED INJURIES THAT THE OTHERS BEFORE US HAVE SUFFERED FROM THE SAME NEGLECT.

WE ARE BRINGING THIS ACTION INDIVIDUALLY AND COLLECTIVELY, SEEKING \$1,000,000 EACH OR THE AMOUNT(S) A JURY FINDS

P.C. 125B

FIT AGAINST THE DEFENDANT(S) INDIVIDUALLY AND COLLECTIVELY, IN THE INDIVIDUAL AND OFFICIAL CAPACITIES.


OUR PHYSICAL AND PSYCHOLOGICAL INJURIES / DAMAGES ARE NUMEROUS AND WILL EFFECT US LIFELONG AND WILL IMPACT OUR ABILITIES TO HAVE COMFORTABLE QUALITY OF LIVES.

WITH THE APPOINTMENT OF COUNSEL AND INDIVIDUAL CONSULTATION WE WOULD EACH BE WILLING TO SETTLE THIS MATTER PRIVATELY.

WE ASK THAT ALL AUDIO/VIDEO SURVILLIGENCE BE PRESERVED, AS WE'RE AWARE THAT CORK IS ALREADY TRYING TO COVER THIS UP.

EACH OF US HAVE SUBMITTED MEDICAL REQUESTS AND GRIEVANCES THAT HAVE GONE UNANSWERED AND WE FEEL HAVE BEEN DISCARDED IN A CODE-OF-SILENCE / COVER-UP / CORRUPT "GREEN WALL" NATURE.

THE ABOVE IS TRUE TO MY KNOWLEDGE.

(SIGN)  (IN PRO-SE) (DATE) 12/26/22

DECLARATION - . . .

I, BROWN, L. (#X-08560) DECLARE UNDER MY OWN FREE WILL THAT I AM A PARTY / PLAINTIFF / WITNESS VERSUS CDCR, ET. AL IN THIS CIVIL ACTION BEING FILED IN AN INDIGENT INMATE / PATIENT HOUSED AT CCWF IN CHOWCHILLA, CALIFORNIA.

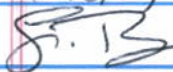
ON 12/24/22, AT APPROXIMATELY 0800 HOURS, I WAS ASKED BY CCWF STAFF TO PUSH 'P CARROLL (WB1153) TO CCWF/805 CLINIC. UPON HEADING INTO 805, 'P CARROLLS WHEELCHAIR HIT A KNOWN (BY STAFF) HAZARDOUS CRACK IN THE PAVEMENT CAUSING HER TO FALL OUT OF HER WHEELCHAIR AND SUSTAIN SEVERAL INJURIES. IN TRYING TO PREVENT 'P CARROLL FROM FALLING, I RECEIVED INJURIES TO MY SHIN, LEG, ARMS, HANDS, SHOULDERS, NECK AND BACK. IN CDCR'S CODE-OF-SILENCE / COVER-UP MODE, I WAS DENIED MEDICAL TREATMENT.

AS I AM PERSONALLY AWARE OF SEVERAL INMATES SUFFERING SERIOUS INJURIES BASED ON CCWF BEING OUT-OF-COMPLIANCE WITH ADA GUIDELINES FOR PAVED / SAFE PATH OF TRAVEL, I AM ALSO AWARE OF THE YEARS OF COMPLAINTS ABOUT THIS.

THE ABOVE IS TRUE TO MY KNOWLEDGE -

(SIGN)

(IN PRO-SE) (DATE)



BROWN, L

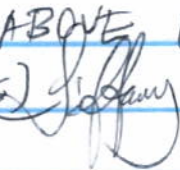
12/26/22

DECLARATION. . .

I, TOOKS, TIFFANY (#WB1123), OF MY OWN FREE WILL DECLARE THAT IM A PLAINTIFF/PARTY/WITNESS VERSUS CDCR, ET. AL IN THIS CIVIL ACTION BEING FILED. IM INDIGENT INCARCERATED PERSON HOUSED AT CCWF IN CHOWCHILLA, CALIFORNIA.

ON, 11/18/22, AT APPROXIMATELY 11:15 HOURS, CCWF STAFF ASKED ME TO PUSH INMATE/PATIENT PATTON, (#WG726) TO THE CLINIC. WHILE DOING SO HER WHEELCHAIR GOT CAUGHT IN A HAZARDOUS CRACK IN THE PAVEMENT CAUSING HER TO FALL OUT OF HER WHEELCHAIR AND SUFFER MULTIPLE INJURIES. SUBSEQUENTLY, I SUFFERED INJURIES TO MY NECK, BACK, ARMS, SHOULDERS, WRISTS AND FINGERS WHILE TRYING TO PREVENT HER FROM FALLING. IN CDCR'S USUAL EFFORTS TO COVER-UP ITS WRONGS, I WAS DENIED MEDICAL TREATMENT.

THERE'S BEEN YEARS OF DOCUMENTATION ABOUT THE RISK OF DANGER TO MOBILITY IMPAIRED INMATE/PATIENTS AND THOSE WHO ASSIST THEM AS A DIRECT RESULT OF CCWF'S WILLFUL AND WANTON NEGLECT TO FIX ROADS. THIS CONSTITUTES FAILURE TO PROTECT.

THE ABOVE IS TRUE TO MY KNOWLEDGE
(SIGN)  (IN PROSE) (DATE) 12/26/22
P.C. 1258

DECLARATION...

I, PATTON, (#WG7261) OF MY OWN FREE WILL
DECLARE THAT IM A PARTY/PLAINTIFF/WITNESS
VERSUS CDOR, ET. AL IN THIS CIVIL ACTION
BEING FILED. IM AN INDIGENT INMATE/PATIENT
HOUSED AT CCWF IN CHOWCHILLA, CALIFORNIA.
ON, 11/18/22, AT APPROXIMATELY 11:15 HOURS, I
FELL OUT OF MY WHEELCHAIR WHILE BEING
PUSHED BY 'IP TOOKS, T (#WB1123) AFTER MY
WHEELCHAIR HIT A HAZARDOUS CRACK IN THE
PAVEMENT. I SUFFERED MULTIPLE INJURIES,
AS DID 'IP TOOKS, WHO TRIED TO PREVENT
ME FROM FALLING.

IM AWARE THAT THERE'S BEEN YEARS
OF COMPLAINTS ABOUT THE UNSAFE PATH
OF TRAVEL AT CCWF. CDOR/CCWF FAILING
TO TAKE CORRECTIVE MEASURES TO FIX
THE ROADS IS FAILURE TO PROTECT ME
THE ABOVE IS TRUE TO MY KNOWLEDGE.

(SIGN) (IN PRO-SE) (DATE)

Morva Patton
WG7261

DECLARATION...

I, WILLIAMS, D (#) DECLARE OF MY OWN FREE WILL THAT IM A PLAINTIFF / PARTY / WITNESS VERSUS CDCR IN THIS CIVIL ACTION BEING FILED. IM AN INDIGENT INMATE / PATIENT IN CDCR MHDS AT CCCMS/DDP LEVEL OF CARE.

BASED ON MY DDP STATUS AND MEDICAL ISSUES, IM UNSURE OF THE TIME AND DATE BUT OVER A MONTH AGO, A REGISTERED NURSE WAS PUSHING ME OUT OF CCWF/BOS CLINIC WHEN WE HIT A HAZARDOUS CRACK IN THE PAVEMENT. THIS CAUSED ME TO FALL OUT OF MY WHEELCHAIR AND SUSTAIN SEVERAL INJURIES THAT WENT UNTREATED. BECAUSE IM DDP, CCWF/CDCR IS ATTEMPTING TO COVER-UP THE FACT THAT THEY FAILED TO PROTECT ME.

THE ABOVE IS TRUE TO MY KNOWLEDGE
(SIGN) (IN PROSE) (DATE)

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

JURY TRIAL AND/OR \$1,000,000 EACH FOR PHYSICAL /
PSYCHOLOGICAL DAMAGES AND TO BE ABLE TO AFFORD ATTORNEYS
FOR THE RETALIATION TO COME FROM CDCR GREEN WALL, INCLUDING
THE SABOTAGE(S) OF OUR PAROLE SUITABILITY HEARINGS AND/OR
IMMEDIATE, BRIEF, DISCREET SETTLEMENT(S) WITH PROMISE TO
FIX ROADS AND NO RETALIATION

I declare under penalty of perjury that the foregoing is true and correct.

Date: 12/26/22

Signature of Plaintiff:



(Revised 4/4/14)